

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION

SCRAMOGE TECHNOLOGY LTD.,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Case No. 6:21-cv-00616-ADA

JURY TRIAL DEMANDED

[REDACTED]

REDACTED DOCUMENT

**DECLARATION OF BIJAL VAKIL IN SUPPORT OF GOOGLE LLC'S
MOTION TO TRANSFER VENUE TO THE NORTHERN DISTRICT OF
CALIFORNIA UNDER 28 U.S.C. § 1404(a)**

I, Bijal Vakil, declare and state as follows:

1. I am an attorney at the law firm of Allen & Overy, LLP, counsel for Defendant Google LLC, in the above-entitled action. I have personal knowledge of the facts stated herein and, if called to testify, could and would competently testify thereto.
2. Attached as **Exhibit 1** is a true and correct copy of Scramoge Technology Ltd.'s Dun & Bradstreet (D&B) Global Family Tree Report, dated September 17, 2021.
3. Attached as **Exhibit 2** is a true and correct copy of the results of a records search for Scramoge Technology Ltd. with the Texas Secretary of State, dated September 16, 2021.
4. Attached as **Exhibit 3** is a true and correct copy of [REDACTED] filings with the California Secretary of State.
5. Attached as **Exhibit 4** is a true and correct copy of [REDACTED] filings with the California Secretary of State.

6. Attached as **Exhibit 5** is a true and correct copy of [REDACTED] filings with the California Secretary of State.

7. Attached as **Exhibit 6** is a true and correct copy of excerpts from the Assignment History for U.S. Patent No. 9,997,962.

8. Attached as **Exhibit 7** is a true and correct copy of excerpts from the Assignment History for U.S. Patent No. 9,843,215.

9. Attached as **Exhibit 8** is a true and correct copy of excerpts from the Assignment History for U.S. Patent No. 10,367,370.

10. Attached as **Exhibit 9** is a true and correct copy of excerpts from the Assignment History for U.S. Patent No. 10,804,740.

11. Attached as **Exhibit 10** is a true and correct copy of a printout of Google Flights from San Francisco, California to Waco, Texas (SFO to DFW or AUS), retrieved September 16, 2021.

12. Attached as **Exhibit 11** is a true and correct copy of a printout of Google Flights from San Jose, California to Waco, Texas (SJC to DFW or AUS), retrieved September 16, 2021.

13. Attached as **Exhibit 12** is a true and correct copy of a printout of Google Flights from Oakland, California to Waco, Texas (OAK to DFW or AUS), retrieved September 16, 2021.

14. Attached as **Exhibit 13** is a true and correct copy of a printout of Google Maps driving distance from DFW (Dallas/Fort Worth International), to the U.S. District Court for the Western District of Texas in Waco, Texas, retrieved September 16, 2021.

15. Attached as **Exhibit 14** is a true and correct copy of a printout of Google Maps driving distance from AUS (Austin-Bergstrom International Airport), to the U.S. District Court for the Western District of Texas in Waco, Texas, retrieved September 16, 2021.

16. Attached as **Exhibit 15** is a true and correct copy of a printout of Google Maps driving distance from Google headquarters in Mountain View, California, to the U.S. District Court for the Northern District of California in San Jose, California.

17. Attached as **Exhibit 16** is a true and correct copy of a printout of Google Maps driving distance from Google headquarters in Mountain View, California, to the U.S. District Court for the Northern District of California in San Francisco, California, retrieved September 16, 2021.

18. Attached as **Exhibit 17** is a true and correct copy of a printout of Google Maps driving distance from Google headquarters in Mountain View, California, to the U.S. District Court for the Northern District of California in Oakland, California, retrieved September 16, 2021.

19. Attached as **Exhibit 18** is a true and correct copy of a chart from Docket Navigator regarding Median Time to Trial for jury trial (patents) for the Western District of Texas (Waco Division), retrieved September 22, 2021.

20. Attached as **Exhibit 19** is a true and correct copy of a chart from Docket Navigator regarding Median Time to Trial for jury trial (patents) for the Northern District of California, retrieved September 22, 2021.

21. Attached as **Exhibit 20** is a true and correct copy of a chart from LexMachina regarding comparative rates of disposition (patents) for the Northern District of California, Western District of Texas, and the Honorable Alan D. Albright, retrieved September 7, 2021.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed September 22, 2021, in Palo Alto, California.

/s/ Bijal V. Vakil

Bijal Vakil